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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DEPARTMENT OF
GENERAL SERVICES

COMMUNICATIONS DIVISION

CITY OF SACRAMENTO
CALIFORNIA

Before
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20544

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RONALD P. COSTA
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In the Matter of

Replacement of Part 90 by

Part 90.1 to Part 90.100

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The City of Sacramento is very concerned about the short time line allowed for compliance with the first phase of the narrow banding required by the new Part 88. Given the current poor budget environment, the required deadline of January 1, 1996, doesn't allow sufficient time for compliance.

Affected frequencies, which are currently licensed by the City of Sacramento, are in the 150 MHz VHF high band and 460 MHz UHF band.

The City of Sacramento urges the Commission to extend the January 1, 1996 narrow banding compliance date to January 1, 1998 or later to allow sufficient time for agencies to plan, design, and finance required system improvements and to allow manufacturers sufficient time to design and manufacture type accepted equipment.

Of greater concern to the City of Sacramento is what the future holds for the 851-869 MHz public safety band. The City is currently in the process of participating in the Sacramento Regional Communications Public-Safety 800 MHz trunked radio system. The combined agencies cost of the system is estimated to be in excess of \$40,000,000. With public-safety agencies across the country expending large amounts of money on new modern efficient trunked radio systems, some assurance should be given by the new Part 88 that new trunked radio systems will be left in place for their useful life.

The City of Sacramento urges the Commission to provide a rule in the new Part 88 that allows exclusive use of frequencies in a newly constructed 800 MHz trunked radio system for a period of 18 years or more from the date of the original issuance of a license without any narrow banding.

The rule would allow agencies with large capital investments to use the systems for their useful life without major technical upgrades or in some cases, early replacement.

Reduction of radio channel bandwidth below 12.5 KHz should be delayed until the major manufacturers can design and produce equipment that will operate below 12.5 KHz.

The City of Sacramento also agrees with and subscribes to the technical comments submitted by the Associated Public-Safety Communications Officers (APCO).

The City of Sacramento urges the Commission to consider the above issues carefully and act upon them prudently.

Respectfully submitted,



Ronald P. Costa

5/25/93

Communications Systems Manager

cc: Jack Crist, Deputy City Manager
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